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Counsel for Defendants

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF WYOMING

TIMOTHY MELLON, a Wyoming resident)

Plaintiff,)

v.)

Case No. 13 CV 118-S

THE INTERNATIONAL GROUP FOR
HISTORIC AIRCRAFT RECOVERY, a)

Delaware non-profit corporation and)

RICHARD E. GILLESPIE,)

Defendants.)

Defendants' Witness Disclosures

Pursuant to this Court's October 10, 2013 Order on Initial Pretrial Conference, The
Defendants, THE INTERNATIONAL GROUP FOR HISTORIC AIRCRAFT RECOVERY, a

Delaware non-profit corporation and RICHARD GILLESPIE, an individual, disclose the following trial witnesses:

- 1) All witnesses disclosed in Plaintiff's and Defendants' Initial Disclosures.
- 2) All experts designated by Plaintiff or Defendant including any undisclosed experts needed for rebuttal, impeachment or foundation.
- 3) All witnesses in Plaintiff's Listing of Witnesses filed with this Court April 21, 2014.
- 4) Richard E. Gillespie, 2366 Hickory Hill Road, Oxford, PA 19363. Mr. Gillespie will testify regarding the Niku VI expedition, the Niku VII expedition and TIGHAR's ongoing effort to identify the whereabouts of Ms. Earhart and her Lockheed Model 10e Electra, Plaintiff's allegations and defenses thereto and any other matter relevant to defense of Plaintiff's allegations.
- 5) Mark Smith, c/o John A. Masterson, LEWIS ROCA ROTHGERBER, LLP., 123 West First Street, Suite 200, Casper, Wyoming 82601. Mr. Smith will testify regarding collection and handling of video recorded during the Niku VI and Niku VII expeditions.
- 6) Jeff Glickman, c/o John A. Masterson, LEWIS ROCA ROTHGERBER, LLP., 123 West First Street, Suite 200, Casper, Wyoming 82601. Mr. Glickman will testify regarding his assessment of video recorded during the Niku VI and Niku VII expeditions.
- 7) Kurt Campbell, 2101 L Street NW, Suite 300, Washington DC 20037. Mr. Campbell will testify regarding the status of TIGHAR's and Mr. Gillespie's research and knowledge post Niku VI, preparation for and the press briefing hosted by the United States Department of State in March 2012 and related matters.

Defendants reserve the right to supplement this list as needed resulting from ongoing discovery.

DATED this 21st day of April, 2013.

THE INTERNATIONAL GROUP FOR HISTORIC
AIRCRAFT RECOVERY and RICHARD E.
GILLESPIE

By: /s/
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CERTIFICATE OF SERVICE

I hereby certify that on the 21st day of April, 2013, a true and correct copy of the foregoing was electronically served upon all parties registered as CM/ECF users in this case via the Court's CM/ECF electronic mail service including the following:

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/s/
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